



Timothy J. Straub  
Managing Associate

[timothy.straub@dentons.com](mailto:timothy.straub@dentons.com)  
D +1 212 768 6821

Dentons US LLP 1221  
Avenue of the Americas  
New York, NY 10020-1089  
United States

•• Salans FMC SNR Denton McKenna Long  
[dentons.com](http://dentons.com)

## MEMO ENDORSED

February 22, 2021

**VIA ECF**

The Honorable Edgardo Ramos  
Southern District of New York  
United States Courthouse, Thurgood Marshall  
40 Foley Square  
New York, NY 10007

Defendant must respond to the Complaint by no later than April 9, 2021 if no stipulation of voluntary dismissal is filed.

The application is  granted  
 denied

  
Edgardo Ramos, U.S.D.J  
Dated: 2/22/2021  
New York, New York

Re: *Romero v. Allstar Products Group, LLC*: Case No. 20-cv-07185-ER

Dear Judge Ramos:

We represent defendant Allstar Products Group, LLC ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty-five (45) days from February 22, 2021 to April 9, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

*/s/ Timothy J. Straub*  
Timothy J. Straub

cc: All counsel of record (by ECF)